

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of

Creation of a Low Power  
FM Radio Service

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MM Docket No.

To: The Commission

COMMENTS OF COLTRE BROADCASTING, INC.

Coltre Broadcasting Inc. ("Coltre") hereby submits its  
Comments on the FCC's proposal to establish a new, low power FM  
broadcast service, stating as follows:

Coltre is a small, closely-held corporation whose owner  
resides in Wood River, Illinois, in the southwest portion of that  
state and on the periphery of the St. Louis, Missouri  
metropolitan area. The surrounding area is one of smaller but  
distinct communities which have their own schools, businesses,  
churches, civic organizations, and other aspects of community  
life. The local population identifies with their towns and have  
local governments, local concerns and local interests which do  
not necessarily match those within larger metropolitan areas.

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They are interested in local news, whether it may involve coverage of local town council meetings or local high school football games. Local businesses, whether retail stores or restaurants, likewise seek to attract and serve local consumers.

These residents, like most residents throughout the country, have access to national and regional programming due to the media which are located in and which direct their service to the metro region as a whole, and particularly to the central urban areas of that region. What these people do not have, however, are local broadcast services which direct programming to them and which provide an advertising medium for their local businesses. Their local needs and interests are not addressed by major-market media, nor can local businesses afford to advertise using those media.

Coltre, itself, tried to operate a local FM station (WFUN-FM, licensed to Bethalto, Illinois) which would provide this much-needed service.<sup>1</sup> Facing the huge costs (for a small business) of constructing and operating a full-scale facility, we soon found that we could not pay off our start-up debts and meet our ongoing expenses with the revenue available in our small

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<sup>1</sup>Coltre's principal also owned Bethalto Broadcasting, Inc., which held the WFUN-FM license before it was assigned to Coltre.

market. When we instead attempted to broaden the range of our service to include the entire area covered by our signal, we were simply slaughtered by the higher-powered, centrally-located stations who could attract the listeners and advertisers needed to sustain such an operation. (We previously made this clear to the FCC when we requested, and received, a refund of our annual regulatory fees for the years we tried to operate.) This situation, which was difficult at best, became untenable when the multiple ownership rules were changed to allow large conglomerates to buy up many stations in a single market. As a result, we had to give up our hopes of running a truly local radio station, and so we sold our station to one of those large corporations, who could operate it in conjunction with its other stations and thus blend its operation into the multi-station service which it directs to the metro area as a whole.

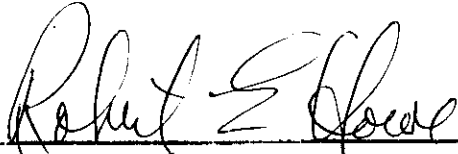
Although the huge number of multiple acquisitions and consolidations by large, wealthy corporations have received the most publicity, and the powerful interests of those companies seem to have been the focus of the revised Telecommunications Act passed by the Congress, Coltre believes that there is an important place in this country for smaller, locally-owned and

operated radio stations which can serve the smaller communities which still exist throughout this nation. The low power FM service proposed by the FCC in this proceeding is one very good way to meet this need and to restore the local service which used to be the proud hallmark of radio. If Coltre owned such a station, our signal would only cover -- and only need to cover -- the local community; it would not be nearly as expensive to build and operate an LPFM station; we could afford to focus on local issues of interest and importance to our area; and local businesses who wished to attract local consumers would be able to afford to advertise what they have to offer.

In sum, the FCC has now released a proposal which would enable local broadcasters to again survive and to provide the type of service which the larger big-city conglomerates simply ignore. There still is a place in this nation for old-fashioned local service which is directed to specific smaller communities. There is a need for something other than the mass-produced, impersonal, satellite-delivered programming which now floods the airwaves. The FCC's proposal will help satisfy that need. Coltre is ready to provide the service which the new LPFM regulations would allow. We therefore strongly support the FCC's proposed LPFM service.

Respectfully submitted,

COLTRE BROADCASTING, INC.

By:   
Robert E. Howe, President

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August 2, 1999